

2000 YEAR END - COURTESY REPORT  
DOCUMENTING THE IMPLEMENTATION OF THE  
OPERATIONS AND MAINTENANCE PLAN

**FORMER HECKATHORN NPL SITE**

**Located At The**

**LEVIN-RICHMOND TERMINAL CORPORATION  
402 WRIGHT AVENUE  
RICHMOND, CALIFORNIA**

December 2000

## 1.0 INTRODUCTION

This document is submitted to the United States Environmental Protection Agency (USEPA), Hazardous Waste Management Division as a courtesy. Levin-Richmond Terminal Corporation (LRTC) in compliance with the State of California General Storm Water Permit for Discharges of Storm Water Associated with Industrial Activities (General Permit) has performed activities that are included in its Storm Water Monitoring Plan (SWMP). The SWMP also provides the basis for the evaluation of compliance with the General Permit and Storm Water Pollution Prevention Plan (SWPPP). The combination of the SWMP and the SWPPP entail the storm water monitoring and pollution prevention plans for the entire 42 acre site and facilities owned and operated by LRTC.

As required by the USEPA Consent Decree, dated April 22, 1996 and the completed Upland Cap Installation, Former United Heckathorn Facility, Richmond California, the Operations and Maintenance Plan (O&M Plan) describes the procedures for the long-term management of the upland capping system at the 4.5 acre Heckathorn NPL Site. The results of inspections, monitoring and maintenance of the cap and drainage system are to be documented in an Annual Report. The upland remedy implemented by LRTC and Levin Enterprises Inc. was approved on September 30, 1999. There was no activity to report for the period ending June, 2000. In order that the Annual Report of the O&M Plan may coincide with the Annual Report requirements of the SWMP and the SWPPP, LRTC will submit both Annual Reports in June of each year. All referenced reports and documents are available at LRTC and will be sent to USEPA upon request.

This document presents the December 2000, year-end summary of recent inspection and maintenance by LRTC of the cap and associated storm water interceptors. Because the monitoring of the storm water takes place during the wet season and the full results of the sampling and analysis are available at the end of the wet season, submittal of Annual Reports will be made in June of each year. In summary, due to the cross over reporting among the O&M Plan, the SWMP and the SWPPP, this document is submitted to the USEPA as a courtesy.

### 1.1 Background

PES Environmental prepared the finalized SWMP and the SWPPP in June, 2000. On behalf of LRTC, PES Environmental also prepared and caused to be filed the 1999-2000 Annual Report for Storm Water Discharges Associated with Industrial Activities, for the period ending June, 2000. Plans for cleaning the five storm water interceptors were developed and implemented by Decon Environmental Services in September, 2000. This report is intended to supplement the June, 2000 Annual Report and will be incorporated in the June, 2001 Annual Report.

## 1.2 Current Site Use

The Levin-Richmond Terminal Corporation operates a dry bulk marine terminal, encompassing approximately 42 acres. Total activities include uncovered storage of cargo materials such as furnace coke, cottonseed, bauxite, and aggregates. Such cargo is stockpiled onsite and loaded onto vessels or unloaded from vessels to rail cars and trucks. The capped section of the former Heckathorn Site is used for stockpiling cargo and railroad operations.

## 2.0 CAP AND STORMWATER INTERCEPTORS

### 2.1 Description of Capping System

#### Concrete Cap

The cap is located in the upland area, former location of the former United Heckathorn facility. The cap consists of minimum 6" concrete with reinforcing steel wire. The reinforcing steel consists of a double layer of 6' by 6' W4.5 X W45 steel welded wire fabric (WWF). In some areas the cap overlies asphalt. In the other areas where asphalt does not exist, the cap overlies a double layer of 4-inch by 4-inch W4.5 X W4.5 WWF. In these areas the sub-grade was prepared and compacted.

#### Geotextile Fabric and Gravel Cover

Some areas of the upland cap where the storage and handling of bulk materials does not occur were covered with a geotextile fabric and gravel. These areas consist of soils potentially containing pesticides. The geotextile membrane and six-inches of clean imported gravel cover these soils.

### 2.2 Inspection of Cap

The cap was inspected by Mr. Shawn Mendoza, Superintendent for Levin-Richmond Terminal Corporation (LRTC), in September 2000, and found to be intact and in good condition. Ms. Helen Mawhinney, of Environmental Technical Services, accompanied by Mr. Mendoza, inspected the cap again on November 22, 2000. The cap was found to be uncompromised with only occasional surface "feather" cracks typical of those, which develop subsequent to the curing of freshly poured concrete. The cracks were insignificant and not indicative of stress fractures. These surface cracks are too small to repair.

## 2.3 Inspection of Drop Inlets and Interceptors

LRTC retained Decon Environmental Services to drain and clean storm water interceptors SW3 - SW-7, located in the United Heckathorn Upland area. Prior to removing storm water, Environmental Technical Services collected a water sample on September 26, 2000, from each interceptor. The water samples were composited at a State certified hazardous waste analytical laboratory, as directed by All Chem Environmental for disposal profiling. The composite samples were designated as No. SW 3, 5, 6, 7 and No. SW3/4/5/6/7.

Samples SW4<sup>1</sup>, and SW 3,5,6,7, were analyzed for Total Petroleum Hydrocarbons as diesel (TPHd, using EPA Method 8015 modified, extractable), and, Motor Oil (using EPA Method 413.1).

Sample No. SW 3, 4, 5, 6, 7, was analyzed for Total Petroleum Hydrocarbons as gasoline, benzene, toluene, ethylbenzene, total xylenes (TPHg, & BTEX using EPA Method 8015 modified, pesticides (using EPA Method 8081), halogenated hydrocarbons (using EPA method 8010), aluminum, copper, lead (using EPA Method 200.7), iron and zinc (using EPA Method 6010B), pH. (using EPA Method 1501) total suspended solids (TSS, using EPA Method 160.2), and chemical oxygen demand (using EPA Method 410.4).

### Purging and Cleaning of the Storm drains

Laboratory analytical results were presented to Stephen Friday, inspector for the City of Richmond, for review to determine if water removed during the storm water interceptors cleaning process could be discharged into the sanitary sewer. On October 21, 2000, Mr. Friday met with ETS and Shawn Mendoza to inspect the storm drains and sanitary sewer. Mr. Friday approved the disposal of interceptor wastewater into the local sanitary sewer. A current Waste Water Discharge Permit was obtained. Mr. Friday was scheduled for inspection and duplicate sample collection, if he desired, on the days of discharge.

LRTC retained Decon Environmental Services (Decon), a Hazmat certified contractor with site experience, to empty and clean Interceptors SW-3 through SW-7. Decon began pumping water from the interceptors on November 1, 2000, using a Decon vacuum truck. Water was discharged from the vacuum truck into an onsite Baker tank, then from the tank into the sanitary sewer. Sediment was removed from the interceptors using a pressure washer to liquefy the sediment, which was then pumped into the vacuum truck. Sediment was released from the truck onto 6-ml plastic, and covered with 6-ml plastic bermed with K-Rail. Sediment is stored away from the drop inlets and will be disposed of at a qualified landfill pending analytical results.

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<sup>1</sup> Discrete sample #SW4 was analyze for TPHc and TOG separately, due to slight sheen noticed on the water surface.

Subsequent to emptying, Decon pressure washed the each interceptor's floor and sidewalls. This process was repeated until all sediment had been removed and the cleaning of each interceptor complete.

### 3.0 SAMPLING OF STORMWATER INTERCEPTORS SUBSEQUENT TO RAINFALL

Rainfall did not occur through December 31, 2000 in quantities sufficient to create an outpour of storm water from interceptors SW3 - SW7. Decon was able to empty all storm water and sediment from each interceptor prior to cleaning, allowing LRTC to enter the rainy season with dry interceptors. This practice allows LRTC to prevent the discharge of water and sediments from these interceptors into the Lauritzen Channel.

### 4.0 BETTER BUSINESS PRACTICES / GOOD HOUSE KEEPING

Levin-Richmond Terminal Corporation has been working closely with Environmental Technical Services improving and upgrading each site process that could adversely impact the environment. Improvements are not limited to but include the following:

#### Street Sweeper

LRTC purchased an in-house Tennant truck mounted vacuum street sweeper which is scheduled to perform daily sweeping of outside surface areas, and cleanup following the loading of ships. The sweeper is positioned and manned during appropriate cargo operations.

#### Brooms

LRTC operates two (2) IT-28 tractors with broom attachments to perform clean up of the capped surface following cargo operations.

#### Hay Bales

Hay bales are placed around the entirety of each interceptor and storm drain that is not raised. Interceptor SW-7, located near the hopper building, is covered with plastic when the hopper is in use, to prevent the dropping of material from the hopper onto the interceptor. The steel plate covering interceptor SW-7 has a tight seal therefore it is doubtful material would enter the basin, however covering the interceptor is an added precaution.

A daily inspection is conducted by supervisors of all working stockpiles, mobile equipment, and conveying equipment, for containment and cleanliness to eliminate the buildup of material on jackwalls, equipment, roadways, and surfaces. Small spills are given the same attention as large spills.

Cargo stockpiles are stored away from surface waters, drains, and storm water inlets.

### Absorbent Materials

Mr. Lou Butty, of American Textile, was retained to place absorbent snakes, socks, pillows, and filters, around and within each interceptor and storm drain. The absorbent materials are photosensitive and have a limited life span. Each absorbent type is closely monitored and on a replacement scheduled. The absorbent materials are white allowing easy detection of saturation with waste.

Clean up stations have been placed strategically throughout the site in close proximity to areas where potential contaminants are used or stored. These materials are stored in foil factory sealed bags to maintain their integrity. Ample supplies of absorbent booms are stored at LRTC.

A Dock Emergency Response Station has been established to efficiently organize access to adequate cleanup supplies.

Exposed soil and ties beneath railroad car "parking stations" have been covered with "Trackmat", an absorbent fabric barrier, prescribed and provided by American Textiles. This material is scheduled for routine replacement.

### Training

LRTC personnel working with potential contaminants are OSHA 40-hour HAZ trained, with a yearly eight-hour refresher course. Qualified personnel are also spill response trained.

Persons collecting storm water samples have been trained in their proper collection, storage, and maintaining clean sample containers and equipment. A dedicated disposable bailer is used for each storm water drain. Disposable latex gloves are changed should an unclean surface be encountered and between samples. Headspace is eliminated in sample bottles and appropriate preservatives are used. Samples are stored in a clean cooler on clean ice, and transported to a qualified hazardous waste laboratory, under chain of custody, and within the sample holding time. Samples are properly labeled with LRTC, Interceptor and the interceptor number, preservative, date, time, and name of sampler.

### Marine Spill Emergency Response

LRTC has leased year round emergency response vessel docking space to Clean Pacific, which includes a contract to immediately respond to an LRTC marine spill, should one occur. This contract includes providing emergency response vessels, personnel, absorbent consumables and Coast Guard approved oil containment boom. LRTC has also established a verbal agreement with Zaccor Companies Inc., in contract with FOSS Environmental, to provided 24-hour emergency response on both land and water.